Good Morning. Mr. Chairman, members of the Science Advisory Panel, Mr. Housenger, and my other EPA colleagues, thank you for the opportunity to provide comments. My name is Sheryl Kunickis and I am the Director of the U.S. Department of Agriculture – Office of Pest Management Policy.

Ensuring that all parts of U.S. agriculture have the crop protection tools necessary to produce a robust food supply is part of our mission at USDA. The recommendations you will make as part of this Scientific Advisory Panel will have an enormous impact on the world's food supply. The shift EPA is suggesting – from an established point of departure based on acetylcholinesterase inhibition to a new point of departure based on the Columbia University epidemiological study – is momentous and cannot be understated. We at USDA feel very strongly that this type of major change should only be made if the level of confidence – in both the results of the Columbia Study and EPA's approach for using these results – is very high indeed.

Your recommendation for how EPA regulates chlorpyrifos will reach far beyond this one active ingredient, and will affect not only how other organophosphates are regulated, but many other broad classes of pesticides as well. This is a major shift in pesticide regulation, and there are major potential impacts – the cost to our food supply, to our economy, to tax payers, and to low-income Americans.

We at USDA stand ready to have further dialogue and assist in the technical details of this issue. In particular, we believe further interagency discussion regarding the capabilities and limitations of the Columbia University study and of epidemiological studies in general would be a useful dialogue. In addition, we believe additional discussion is warranted regarding the limitations of assessing a single chemical in light of exposure to many different chemicals over a developmentally crucial multi-year period.

For over 40 years, the EPA Office of Pesticide Programs has been the "gold standard" across the world for entities that register and have oversight of pesticides. Because of EPA's scientifically based, well vetted, and transparent approach, the agricultural community has had the confidence to use pesticides as part of a world class agricultural production system. Chlorpyrifos is up first and the subject of this meeting, so let me share the following noting it is but an example of the value of pesticides in general.

Chlorpyrifos is a key tool for farmers in managing a wide array of pest insects and is a critical part of Integrated Pest Management (IPM) programs in well over 50 crops grown throughout the United States. This is due to its efficacy, broad-spectrum activity against multiple pests, and its fit with conservation biological control in crops such as citrus, tree fruit, and cotton. Changes to the process that result in losses of important crop protectants will likely have a significant negative impact on the production capabilities and economic stability of producers of many human and animal food crops. This is true particularly where few or no efficacious insecticide alternatives are available, where resistance management with limited alternatives is a concern, where Maximum Residue Limits (MRLs) for effective insecticide alternatives are not established for export markets, and where crops experience invasive and/or endemic pest outbreaks.

As I said at the beginning, the implications for the outcome on this question are profound – with potential costs to our food supply, to our economy, to tax payers, and to low-income Americans. We would like to work with you further to ensure the very best science-based policy outcome.

Thank you.